

EXHIBIT 1

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOROTHY FORTH, TROY TERMINE,)
CYNTHIA RUSSO, INTERNATIONAL)
BROTHERHOOD OF ELECTRICAL)
WORKERS LOCAL 38 HEALTH AND)
WELFARE FUND, LISA BULLARD AND)
RICARDO GONZALEZ, on behalf of)
themselves and all others)
similarly situated,) Civil No. 1:17-cv-02246
Plaintiffs,)
vs.)
WALGREEN CO.,)
Defendant.)

** CONFIDENTIAL **
VIDEOTAPED DEPOSITION OF
CHRIS DYMON
October 5, 2018
3:15 p.m.

Taken at:
104 Wilmot Road
Deerfield, Illinois

Scot Ziarko, Videographer
Diana G. Polk, Certified Shorthand Reporter

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1 about some of the different acronyms and names.

2 Intercom Plus, what is that?

3 A That is our pharmacy fulfillment system.

4 Q So what does Intercom Plus do as it
5 pertains to claims processing adjudication?

6 A It is the system that our stores use to
7 enter in a prescription and that system takes all of
8 the data from a prescription and transmits it to the
9 payer.

10 Q And so I understand, can you describe for
11 me at a high level sort of the steps that a claim would
12 go through as it pertains to the Intercom Plus system
13 and how it would then go out to a payer. Do you have
14 an understanding of how that works?

15 A A general understanding, yes.

16 Q Can you describe for me that process.

17 A A team member has to enter in basic
18 elements of a prescription, for example, the date, the
19 drug name, quantity, quantity dispensed, if there's
20 refills, what are the directions on a prescription, the
21 prescriber, any identifiers associated with the
22 prescriber, such as an MPI number. Once all of that
23 information is present, an individual if we have their
24 insurance on file, a team member hits a button in our
25 system and then takes all of that information, formats

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1 it into basically a data string, and then that string
2 of data goes from Walgreens to our switch vendor and I
3 think of that as an operator, right, connecting us from
4 a Walgreens to whatever payer we're trying to send that
5 claim to, that switch vendor connects us to the payer,
6 they take that information, they interrogate however
7 their system does so, and then they give us a response
8 of, yes, it's a paid description claim, or no, it's a
9 denied prescription claim and that information goes
10 back to the switch, back to our Intercom Plus system.

11 Q And so as I understand it, the data that
12 you say is gathered at the, say, at the time a script
13 is being considered for payment or in the transaction
14 process, is there a specific set of data elements that
15 have to be gathered?

16 A Yes.

17 Q What are those called?

18 A All the elements are what we call NCPDP
19 telecom standard, the D.0 standard.

20 Q Again acronyms. NCPDP is what?

21 A National Council for Prescription Drug
22 Programs.

23 Q And the D dot zero?

24 A The designation of the current framework
25 for how a claim -- the elements that are required for a

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1 prescription claim. That's the easiest way to explain
2 that.

3 Q And those elements, are they standard for
4 each payer or are they different depending on the
5 payer?

6 A There are elements that are standard
7 industry. It's an standard that all pharmacies use.
8 There are elements that payers can request to have
9 optional or on and off and we set up a payer based on a
10 payer sheet or what the payer is requesting.

11 Q So a payer sheet is what?

12 A Essentially a document that clearly
13 defines what the payer needs in order to adjudicate or
14 provide a response to your claim.

15 Q And that payer sheet would include the
16 NCPDP number along with the description of the data
17 element?

18 A Correct. All of the elements, yes.

19 Q So the information is plugged into by
20 the-- would it be at the local pharmacy? Where is that
21 information initially gathered for a particular script?

22 A At the store level for a prescription,
23 yes.

24 Q So the pharmacy tech or some pharmacy
25 employee keys in certain relevant information?

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C E R T I F I C A T E

I, Diana G. Polk, a Certified Shorthand Reporter do certify that heretofore said witness personally appeared before me produced as a witness for examination in said cause.

I further certify that the said witness was by me first duly sworn to testify the truth, the whole truth, and nothing but the truth in the cause aforesaid before the taking of the deposition; that the testimony was reduced to writing in the presence of said witness by means of machine shorthand and afterwards transcribed into typewriting via computer-aided transcription under my personal direction; and that the foregoing is a true and correct record of the testimony given by said witness.

I further certify that my certificate annexed hereto applies to the original transcript and copies thereof, signed and certified under my hand only. I assume no responsibility for the accuracy of any reproduced copies not made under my control or direction.

A handwritten signature in cursive script, reading "Diana Polk", is written over a horizontal line.

Diana G. Polk, CSR

CSR No. 084-002945